

[REDACTED]

297. [REDACTED]

[REDACTED] JPMC Ex. 262 at 223:1-10.

298. [REDACTED]

[REDACTED] JPMC Ex. 262 at

221:19- 222:14. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex.

262 at 219:21-221:24; 222:2-13; 232:05-235:13.

299. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 262 at 229:06-230:11.

300. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex.

262 at 236:23-238:9.

301. [REDACTED]

[REDACTED] JPMC Ex. 261 at 329:17-330:15; 333:7-12.

[REDACTED]

302. On September 6, 2012, Darren Indyke wrote to Ms. Shani Pinney stating “As you requested when Mr. Epstein appeared at the Department of Justice on Tuesday, I have attached copies of Mr. Epstein’s two U.S. Passports and a Memorandum explaining why Mr. Epstein qualifies as a tier 1 offender.” JPMC Ex. 279 at -12286.

303. [REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 261 at 230:23-231:18.

304. Epstein served a 13-month sentence and was convicted of solicitation of a minor. JPMC Ex. 11; JPMC Ex. 12. Under USVI’s Sex Offender Legislation, a “Tier 1” offense includes any sex offense that is not a “Tier 2” or “Tier 3” offense. JPMC Ex. 281, § 1721B(a)(1). And a Tier 2 offense includes any sex offense against a minor that involves “the use of minors in prostitution, including solicitations.” *Id.* § 1721B(b)(2).

305. A summary of a meeting with Ms. Carbon indicates that Ms. Carbon “want[ed] him to be classified higher but . . . believed they weren’t able to put him as a level 3.” JPMC Ex. 274. It also states that Ms. Carbon “can’t recall whether she considered [his] 13 month sentence when looking at the tier assignment for Epstein” and “can’t recall” her analysis about the fact that solicitation of minors is designated as a Tier 2 offense under the statute. JPMC Ex. 274. It further states that she “can’t recall the process to which a tier was assigned” nor “who made the determination but believed it was likely her.” JPMC Ex. 274.

306. Ms. Pinney, USVI’s 30(b)(6) designee on sex offender monitoring of Epstein, testified that she did not know why Epstein was classified as a Tier I offender and did not know anyone else in the USVI government who would know or could explain what the basis for classifying Epstein as a Tier I was. JPMC Ex. 261 at 324:11-325:10.

[REDACTED]

307. Ms. Borque testified that sex offenders are “usually” checked “once a week,” in addition to an “annual operation” that performs compliance checks for all of the offenders in that week. Thus, she estimated that it was possible that “the average offender would be checked [] 50 times in a year because there’s [sic] 52 weeks in the year.” JPMC Ex. 253 at 199:10-200:23.

308. [REDACTED]

JPMC Ex. 261 at 400:1-12; 441:10-21.

309. Ms. Borque testified that “part of the reason for doing compliance checks” is so that “if an investigator is there and sees something suspicious, they can report it” and that more frequent checks make it less likely that offenders will engage in criminal activity because “they know they’re being checked on.” JPMC Ex. 253 at 202:11-15; 205:3-14.

310. [REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 261 at 437:14-22.

311. USVI DOJ performed a total of five compliance checks on Epstein. JPMC Ex. 282; JPMC Ex. 253 at 220:2-7 (does not know of any compliance checks being lost for Epstein). Of those five checks, he was present on the island only once. JPMC Ex. 282 at -12619-12620.

312. None of the compliance boxes were checked “Needs Investigation” or “Not in Compliance”. JPMC Ex. 282.

313. [REDACTED]

[REDACTED]. JPMC Ex. 262 at 114:11-115:21. [REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 266 at 217:15-218:21.

[REDACTED]

314. [REDACTED]

[REDACTED]

[REDACTED]

JPMC Ex.

261 at 407:9-410:4.

315. [REDACTED]

[REDACTED]

[REDACTED]

JPMC Ex. 304.

316. [REDACTED]

[REDACTED]

JPMC Ex. 261 at 419:07-

420:10; JPMC Ex. 283.

317. [REDACTED]

[REDACTED]

JPMC Ex. 261 at 420:11-421:3; JPMC Ex. 258 at 51:5-

52:14.

318. [REDACTED]

[REDACTED]

[REDACTED]

JPMC Ex. 261 at 443:14-444:07.

319. Ms. Borque testified that this sex offender is “known for sending these kind of threatening emails.” JPMC Ex. 253 at 233:16-234:05.

320. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

JPMC Ex. 263 Jacobs Tr. at 125:23-126:16.

E. Government-Affiliated Officials Gave Epstein Influence And Access In Ways That Facilitated His Crimes And His Transport of Victims

321. Epstein leased hangar space from the Virgin Islands Port Authority (“VIPA”) for his aircrafts. JPMC Ex. 284.

322. Cecile de Jongh negotiated a lease with VIPA for a hangar for Epstein’s aircrafts. JPMC Ex. 208 at 16:3-8.

323. VIPA granted one of Epstein’s employees a VIPA badge, allowing ramp access at a USVI airport with a VIPA escort. JPMC Ex. 285.

324. [REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 286 at -44492.

325. Cecile de Jongh and Governor John de Jongh enlisted Epstein’s support in having Carlton Dowe appointed as the Executive Director of VIPA. JPMC Ex. 287; JPMC Ex. 208 at 96:8-98:15; JPMC Ex. 224 at 127:23-129:11.

326. On several occasions, Epstein had meetings with Executive Director Dowe. JPMC Ex. 288.

327. Governor de Jongh testified that VIPA “over[saw] all the airports and the seaports in the Virgin Islands,” was responsible for security within USVI’s airports, and oversaw the airport’s security officers. JPMC Ex. 224 at 129:24-131:3.

328. USVI’s expert Bridgette Carr [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 289 at ¶¶ 222-24.

[REDACTED]

329. On June 22, 2010, Epstein wrote to Cecile de Jongh to ask “who is [in] charge of customs in the v.i.” and stated that he “used to have a great relationship with gloria Lambert the airport supervisor.” He additionally stated: “there is a mr carpenter ,who has been difficult lately.” Cecile de Jongh responded that she “spoke to Kenn” who would call the head of customs, Louis Harrigan, to find out who Mr. Carpenter was and discuss with Epstein later. JPMC Ex. 290; JPMC Ex. 208 at 84:1-86:21.

330. Kenn Hobson was the “head of VIPA” at one point in time. JPMC Ex. 208 at 60:5-6.

331. Epstein sought Cecile de Jongh’s assistance to gift the 78 customs employees in the St. Thomas Customs and Border Protection office a turkey for Thanksgiving. JPMC Ex. 291.

332. Cecile de Jongh said that it would be “ok” for Epstein to give that gift to the customs officers. JPMC Ex. 291; JPMC Ex. 208 at 86:22-87:11.

333. Cecile de Jongh did not check with anyone before stating it would be “ok” for Epstein to gift turkeys to customs officers in the USVI. JPMC Ex. 208 at 87:12-88:17.

334. [REDACTED]

[REDACTED]

[REDACTED]

JPMC Ex. 292.

335. On March 6, 2012, Cecile de Jongh wrote to Epstein that she had spoken to an attorney, Vince Fuller, “pertaining to the immigration matter” for a female individual employed by Epstein. JPMC Ex. 293.

[REDACTED]

336. Cecile de Jongh assisted Epstein in enrolling three women in English as a Second Language (“ESL”) courses with the University of the Virgin Islands (“UVI”). JPMC Ex. 294; JPMC Ex. 295; JPMC Ex. 296; Ex. 208 at 131:3-15.

337. Cecile de Jongh worked with Dionne Jackson, the Vice President for Institutional Advancement at the UVI, to help enroll three women in ESL classes with the UVI. JPMC Ex. 296 at 20207-20209.

338. As part of the process for enrolling the young women in ESL courses, Cecile de Jongh wrote to Epstein on May 29, 2013 to ask: “What kind of visas do these ladies currently have?” She additionally suggested that the women could enroll in the UVI to acquire an I-20 form for a student visa if required. Epstein responded that Renata had an F-1 visa and Julia had a B-1 visa. JPMC Ex. 296.

339. An I-20 form is required for a citizen of a foreign country to obtain a student (F or M) visa. The form must be “present[ed] ... to the consular officer when [a person] attend[s] [their] visa interview.” JPMC Ex. 297.

340. On June 27, 2013, Cecile de Jongh wrote to Epstein to state that UVI was “structuring the class around the ladies” in regard to the ESL classes in which she helped Epstein enroll three women. JPMC Ex. 298.

341. [REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 299.

342. [REDACTED]

[REDACTED] JPMC Ex. 300.

[REDACTED]

343. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 301.

344. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 302.

345. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 303; JPMC Ex. 87 at -6475, -6482.

346. In April 2014, Epstein and Cecile de Jongh discussed “a new practice act” regarding dental licenses that would have “significant changes and allowances for reciprocity” with Deborah Richardson-Peter, the Director for the Office of Professional Licensure and Health Planning at the USVI Department of Health. Richardson-Peter discussed the issue during a phone call with Epstein and conferred with the dental licensing board for additional information

[REDACTED]

for Epstein. She wrote that the new act was “slated to go before the Senate Committee on health on May 9th, once that process is vetted the board will have a clearer idea on what her options are moving forward.” JPMC Ex. 305.

347. On May 27, 2015, Cecile de Jongh wrote to Epstein: “Bad news re the dental licensure rules and regs – the AG’s office does not have them” and stated she would “let Donald know via text and await his response.” She additionally stated that the “Acting Solicitor General is a good friend of mine, Mac Davis” and that once she received a response from Donald, she would “alert Mac and try to get it fast tracked.” JPMC Ex. 306.

348. On August 5, 2015, Cecile de Jongh wrote to Epstein that Celestino White “is going to work on” [REDACTED]’s dental licensing issue and that she “sent him some of [REDACTED]’s info.” She additionally wrote that White had stated “that it would be easier for him to look into and resolve these things for you if he had a contract with a retainer so that he could state to whomever that he has your permission to have info released to him.” JPMC Ex. 307.

349. Between September 30, 2015 and October 1, 2015, Epstein and Cecile de Jongh exchanged emails regarding the dental license application for [REDACTED]. Epstein asked if he should call Randy Knight, the Governor’s Chief of Staff, regarding the application. Cecile de Jongh suggested that he should not because “Randy is not exactly a light touch or diplomatic and I don’t want the board members to feel that they are threatened into approving [REDACTED].” She stated that she had reached out to Deborah Richardson-Peter and would “call every day” and would “call Donald as well” regarding [REDACTED]’s application. JPMC Ex. 308.

350. [REDACTED]’s USVI dental license was approved in November 2015. JPMC Ex. 309.

F. USVI Funded The Businesses It Claims Were Fronts For Sex Trafficking By Granting Them \$300M In Tax Incentives

[REDACTED]

351. The USVI has alleged that “Epstein formed an association in fact with both companies and non-profit organizations he owned and operated” to aid his criminal efforts. The USVI has specifically alleged that one of these companies was STC, which received economic benefits from the USVI Economic Development Commission (“EDC”), and acted “as a conduit for payment to foreign women, credit cards, airplanes, and other instrumentalities.” JPMC Ex. 310 ¶¶ 24-28.

352. Margarita Benjamin testified on behalf of the USVI government that the USVI Economic Development Authority (“EDA”) is a “semiautonomous entity under the Government of the U.S. Virgin Islands.” JPMC Ex. 311 at 24:9-24:14.

353. Benefits awarded by the EDA must be approved by the Governor of the USVI. JPMC Ex. 224 at 154:6-155:4.

354. Governor John de Jongh approved the award of EDC benefits to STC in 2012. JPMC Ex. 224 at 167:9-168:12.

355. Governor John de Jongh approved a renewal of benefits to FTC. JPMC Ex. 224 at 176:10-16.

356. Governor John de Jongh testified that the governor’s office’s review of EDC benefits applications for approval involved “reviewing the decision that the board made to make sure they complied with Economic Development Authority rules and regulations.” JPMC Ex. 224 at 155:5-14.

357. Governor John de Jongh testified that, when considering EDC benefit applications, he would “review the cover memorandum ... of what was provided” by legal counsel and “may get a little bit more into the activities and understand the type of business” that was applying. JPMC Ex. 224 at 157:5-13.

[REDACTED]

358. Governor John de Jongh testified that, when reviewing applications, he would not “reach out to the person who is applying to ask them questions” and would not “look at the financial projections that they submitted.” JPMC Ex. 224 at 157:20-25.

359. Governor John de Jongh testified that he would “look if – the overview would provide the business, the type of activity. I may or may not look at the application just to understand if it was an unusual business” and that he would review “[t]he legal opinion, making sure it is consistent with the rules and regulations, looking at the business activity, looking at the economic development, diversification that was taking place in the territory.” JPMC Ex. 224 at 157:14-19; 158:15-21.

360. Governor de Jongh testified that if the underlying business activity struck him as “unusual,” “I would, then, more than likely not call the individual. I’d probably call my attorney and ask him to look into it” and they would “report back” to Governor de Jongh. JPMC Ex. 224 at 159:10-17.

361. Governor John de Jongh testified that he was looking to see if the business activity “was unusual” and that, as an example, one year they had “someone that applied that wanted to do manufacturing. We don’t have very many manufacturers in the Virgin Islands, so I just looked at the application to make sure I understood. Some were looking at foreign destinations to sell their products. I wanted to see, you know, what percentage of their business activity they were looking at. Was it – did they consider the U.S. foreign or where are they selling? So I would look at things like that.” JPMC Ex. 224 at 158:22-159:12.

362. When approving benefits for Financial Trust, including considering Epstein’s criminal conviction in conjunction with those benefits, Governor John de Jongh testified that he

[REDACTED]

“went solely on the recommendations of the [Governor’s] staff – of my legal counsel.” JPMC Ex. 224 at 161:4-13.

363. When considering the EDC applications for FTC and STC, Governor John de Jongh testified that he did not “find any of their activity unusual” and did not “ask anyone to do any further investigation into them.” JPMC Ex. 224 at 159:18-160:4.

364. Governor de Jongh testified that he “didn’t give ... much thought beyond” the recommendation of the EDC and his legal counsel to Epstein’s character when approving EDC benefits for FTC. JPMC Ex. 224 at 188:14-190:14.

365. Governor Albert Bryan was the Chairman of the EDC when FTC’s application for a renewal of benefits was approved in 2012. JPMC Ex. 312 at 17987.

366. Governor Albert Bryan was the Chairman of the EDC when STC’s application for benefits was approved in 2014. JPMC Ex. 313 at -18010.

367. The original benefits granted to FTC by the EDC in 1999 awarded FTC a 100% reduction in income taxes. JPMC Ex. 314.

368. When FTC’s benefits were extended, FTC was granted an 81% reduction in income taxes by the EDC. JPMC Ex. 314 at -19064; JPMC Ex. 312 at -17988.

369. In 2013, the EDC awarded a certificate to STC granting a 90% reduction in income taxes. JPMC Ex. 314 at 19065; JPMC Ex. 313 at 18011.

370. Through the EDC program, the EDC granted over \$300 million in tax breaks to FTC and STC. JPMC Ex. 90 ¶ 60, Exhibit 1.

371. JPMC’s expert Carlyn Irwin has opined that “from 1999 to 2018, neither Financial Trust nor Southern Trust came close to generating sufficient benefits to USVI to offset

[REDACTED]

the tax incentives granted to Mr. Epstein and these companies let alone reach the thresholds the EDC considered [REDACTED].” JPMC Ex. 90 ¶¶ 59-66.

372. When Governor de Jongh approved the award of EDC benefits to STC, his wife Cecile de Jongh was an employee of EDC. JPMC Ex. 224 at 174:8-10.

373. The Special Conditions for STC as part of its EDC benefits that were approved by Governor de Jongh mandated that STC “provide its full-time employees and dependents with one hundred percent employer paid medical insurance coverage” as well as other benefits, including tuition reimbursement. JPMC Ex. 224 at 173:21-175:25.

374. On June 30, 2009, while Epstein was incarcerated in Florida, Cecile de Jongh signed a certification related to FTC’s benefits received from the EDC stating that Epstein was a bona-fide resident of the USVI. JPMC Ex. 316 at -13521-13522.

375. On several occasions, official correspondence from the EDA and EDC related to benefits awarded to Epstein’s companies was addressed to Cecile de Jongh. JPMC Ex. 317; JPMC Ex. 318; JPMC Ex. 319; JPMC Ex. 232.

376. Sandra Bess, the EDA Program Compliance Officer who oversaw the compliance reports for FTC and STC, testified that the person she “dealt with” was Cecile de Jongh as the office manager for FTC and STC. Those interactions included during unannounced visits when she would “ask to see the compliance person” and would speak with de Jongh. JPMC Ex. 320 at 36:1-17.

377. On April 10, 2012, in response to a media request received by Governor John de Jongh regarding Cecile de Jongh’s employment with FTC while it was EDC benefits, Cecile de Jongh suggested to Epstein that the response be: “Cecile de Jongh currently works for Financial Trust Company in the capacity of office manager. She had nothing to do with Financial Trust

[REDACTED]

Company receiving EDC Tax benefits.” Epstein responded that “he would simply state that [Cecile de Jongh is] an office manager,” to which Cecile de Jongh responded: “That’s what John went with.” JPMC Ex. 321.

378. Governor de Jongh did not “perceive any conflict of interest in approving benefits” for Epstein’s companies for which his wife, Cecile de Jongh, was an employee. JPMC Ex. 224 at 162:19-25.

379. Governor de Jongh did not request that legal counsel provide an opinion on any potential conflict of interest related to his approval of benefits for companies for which his wife was an employee. JPMC Ex. 224 at 163:1-10.

380. Governor de Jongh testified that he was not aware of any investigation undertaken to assess any potential conflict of interest related to his approval of benefits for companies for which his wife was an employee. JPMC Ex. 224 at 163:20-164:1.

381. Governor de Jongh did not request any assessment of any potential conflict of interest related to his approval of benefits for companies for which his wife was an employee. JPMC Ex. 224 at 163:11-19.

382. Margarita Benjamin, testifying on behalf of the USVI government, testified that no investigations into Epstein and his companies were undertaken by the EDC other than normal compliance audits. JPMC Ex. 311 at 56:22-57:22.

383. On January 7, 2015, USVI EDA Director of Compliance Stephanie Berry wrote a letter to Epstein stating that, “[g]iven the current media discussions surrounding a principal of” STC, the EDA was requesting “an assessment of the potential impact, if any, on the business activities” of STC “as approved by the” EDC. JPMC Ex. 322.

[REDACTED]

384. [REDACTED]

[REDACTED]

[REDACTED]

JPMC Ex. 259 at 61108-61109.

385. Sandra Bess testified that compliance reports for EDC beneficiaries “should be done annually.” JPMC Ex. 320 at 15:9-13.

386. The first compliance review of FTC was completed on April 17, 2008, covering “the period of April 1, 1999 to December 31, 2006.” JPMC Ex. 323.

387. Sandra Bess testified that the compliance process for EDC benefits relied on “information provided by the certificate holder” and sought to confirm that numbers provided “in the cover sheet of the annual report matche[d] what the company ha[d] provided ... in the support behind the cover sheet.” JPMC Ex. 320 at 22:2-23:8.

388. The compliance officer was not tasked with “reviewing the character of the people who are the owners of the companies receiving tax benefits.” JPMC Ex. 320 at 23:9-13.

389. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 324.

390. The public hearings of the EDC related to awarding benefits to EDC reflect that the Commissioners did not ask questions regarding Epstein's criminal history when considering an award of benefits to STC. JPMC Ex. 325; JPMC Ex. 326; JPMC Ex. 327; JPMC Ex. 328; JPMC Ex. 329; JPMC Ex. 330.

391. On October 2, 2019, Margarita Benjamin, the Managing Director of the EDA, wrote to EDA employees Joy Penn and Sandra Bess that questions regarding Epstein's receipt of benefits from the EDC "are opening us up to public scrutiny." JPMC Ex. 331.

392. A "Draft Report on USVIEDA Responses to Media Inquiries about Jeffrey Epstein and his businesses under the VI Economic Development Commission Tax Incentive Program" dated December 5, 2019 states that the USVI Economic Development Authority received 55 total inquiries from 8 publications, 1 television station, and 14 reporters and investigative journalists, "in relation to Jeffrey Epstein and his EDC businesses." "Three (3) interviews were [also] conducted for the New York Times." USVIEDA never reached out to law enforcement in connection with these inquiries. JPMC Ex. 311 at 185:19-188:19; JPMC Ex. 332 at -22697.

393. The EDC and EDA terminated STC's benefits early, effective December 31, 2019, at STC's request. JPMC Ex. 333.

G. Cecile de Jongh Had Official Responsibilities Within the Government As First Lady

394. As First Lady of the USVI, Cecile de Jongh was the chair of the Children's Cabinet, which also included "senior government officials" from the Department of Education,

[REDACTED]

the Department of Labor, and the USVI police department. The Children's Cabinet worked to implement government policy regarding children's issues. JPMC Ex. 208 at 92:8-95:9.

395. One of the initiatives of the Children's Cabinet chaired by Cecile de Jongh was to "make sure that every child caretaker, at least, had a high school degree, and that they worked towards an associate degree[.]" JPMC Ex. 208 at 93:21-94:14.

396. Cecile de Jongh testified that, as first lady, she was "very involved in the National Governors Association." JPMC Ex. 208 at 19:3-19:9.

397. Cecile de Jongh testified that, as First Lady, she had a Twitter account that was named "the official Twitter account of U.S. Virgin Islands' First Lady, Cecile de Jongh." She further testified that she "didn't hire someone separate from the government to manage" the account and that it was likely managed by a government employee. JPMC Ex. 208 at 22:3-23:17.

398. Cecile de Jongh testified that she had a website as First Lady of the USVI that was set up by the public relations department for the Governor of the USVI. JPMC Ex. 208 at 23:3-25:2.

399. The website for First Lady Cecile de Jongh listed the address for the "Office of the First Lady" as the governor's office and the phone number for the general switchboard at the Government House. JPMC Ex. 208 at 26:6-27:15.

400. Cecile de Jongh testified that, as First Lady, she worked with protocol officials for the USVI Government House regarding social events related to her duties as First Lady. JPMC Ex. 208 at 20:24-21:19.

401. Cecile de Jongh testified that, as First Lady, she saw her role as "working on behalf of all the Virgin Islanders." JPMC Ex. 208 at 26:3-26:5.

402. On December 27, 2012, Carole Chapman, the Executive Assistant to the CEO of the USVI EDA, emailed Jennifer Nugent-Hill and Percival Clouden of the EDA that the CEO “had a call from the First Lady and she has asked that Epstein be on the Board agenda (public hearing) for the January 9th meeting.” Cecile de Jongh testified that she called the CEO of the EDA regarding placing Epstein’s issue on the board agenda. JPMC Ex. 334; JPMC Ex. 208 at 80:12-83:7.

403. Governor John de Jongh testified that he “assum[ed]” that Cecile de Jongh “tr[ie]d to avoid things coming to [Governor de Jongh’s] desk that would impact Epstein[.]” JPMC Ex. 224 at 212:3-11.

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